

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

JOLENE K. YOUNGERS,
AS PERSONAL REPRESENTATIVE OF THE
WRONGFUL DEATH ESTATE OF ROXSANA
HERNANDEZ,

Plaintiff,

v.

No. 1:20-cv-00465 WJ/JMR

MANAGEMENT & TRAINING CORPORATION,
LASALLE CORRECTIONS TRANSPORT LLC,
LASALLE CORRECTIONS WEST LLC,
LASALLE MANAGEMENT COMPANY LLC,
GLOBAL PRECISION SYSTEMS LLC,
TRANSCOR AMERICA LLC,
CORRECTIVE, INC.,

Defendants,

and

GLOBAL PRECISION SYSTEMS, LLC,

Third-Party Plaintiff,

v.

ASSET PROTECTION AND SECURITY SERVICES, L.P.

Third-Party Defendant.

**DEFENDANT GLOBAL PRECISION SYSTEMS, LLC'S FED. R. CIV. P. 26(a)(1)
SECOND SUPPLEMENTAL INITIAL DISCLOSURES**

COMES NOW Defendant Global Precision Systems, LLC, ("GPS") through its counsel of record, Butt Thornton & Baehr PC (Monica R. Garcia), and hereby submits the following supplemental disclosures pursuant to Fed. R. Civ. P. 26(a)(1).

Electronically Stored Information (ESI)

[GPS - ESI - Production - GPS0002](#)

GPS_ESI_000193 - GPS_ESI_045610

Respectfully Submitted,

BUTT THORNTON & BAEHR PC

/s/ Monica R. Garcia

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